

REMARKS

This is in response to the Office Action mailed on October 20, 2006. Claims 1-23 and 25-27 were pending in that action. All claims were rejected. With this response, claim 1 is amended and the remaining claims are unchanged.

Claims 1-6, 11-14, 20-23 and 25-27 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application No. 2003/0191731 ("the Stewart reference"). As will be discussed in detail below, it is respectfully submitted that the rejected claims are in fact patentably distinguishable from the Stewart reference.

Applicant's independent claim 1 includes three primary elements (i.e., instantiating, obtaining and applying). The first element reads "instantiating a property of a first object as a second object." Thus, this element involves instantiating a property as an object. In order to further clarify the relationship between the claimed first and second objects, Applicant has, with the present amendment, added the language "wherein the second object is a representation of the property in object form."

Thus, claim 1 very clearly recites instantiating a property as an object. Applicant's specification, at FIG. 4, shows a clear example of such an object. As is very clearly described in the specification, the "PropertyObject" shown in FIG. 4 is consistent with the methods and systems described for treating a property of an object as an object in order to provide validation and enforce constraints.

The Examiner rejects the instantiating element of independent claim 1 on page 3 of the Office Action. In rejecting the element, the Examiner points to a "DataObject" described in the Stewart reference at paragraphs 0038 and 0097. In fact, neither of these passages, nor any other part of the Stewart reference, teaches or suggests that the described "DataObject" is

an instantiation of a property as an object. Paragraph 0038 clearly explains that each component that uses a described rule engine instantiates a data object that holds the current value of each property. The described data objects contain multiple properties for a given component. It is a mischaracterization to say that the described data object is an instantiation of a property of a first object as a second object. The described data object simply contains property values and associated current states. Thus, the first element of claim 1 includes features that neither taught nor suggested by the cited reference.

The third limitation of independent claim 1 states "applying constraint information to a property of the second object to ascertain whether the property is validated." First of all, it is respectfully pointed out that the third element requires application of constraint information through a property of a second object that is an instantiated property of the first object. As has been described, the cited Stewart reference fails to teach or suggest applying constraint information to a property of a second object that is an instantiated property of a first object. For at least this reason, the third element is neither taught nor suggested by the cited Stewart reference.

Further, in rejecting the "applying constraint information" limitation of independent claim 1, the Examiner points to the Stewart reference at paragraphs 0036, 0092, 0112, and 0115-0119. In general, these passages describe interaction between a rule engine and the data object described in various places throughout the Stewart reference. A close examination of these passages in the context of the rest of the reference reveals that constraint information is never applied to a property of an object. Instead, as is clearly described at least in paragraph 0041, each rule object does not have a state but rather works on data that is passed to it. Similarly, as is described in paragraph 0097, when a rule object needs to know the

current value of a property, it calls its associated data object (i.e., to retrieve the data). Accordingly, the Stewart reference describes retrieving data from a data object as part of a validation process but does not describe or suggest applying constraint information to a property of an object. For at least this reason, the third element is neither taught nor suggested by the cited Stewart reference.

For all of these reasons discussed above, it is respectfully submitted that independent claim 1 is neither taught nor suggested by the cited Stewart reference. Dependent claims 2-6 and 11 are dependent upon claim 1 and are believed to be distinguishable from the cited reference based on a similar rationale. Further, it is respectfully submitted that, especially when interpreted in light of all the differences between independent claim 1 and the Stewart reference, dependent claims 2-6 and 11 each recite an individual limitation that is neither taught nor suggested by the cited Stewart reference.

Independent claim 12 is somewhat similar to independent claim 1. The third element of claim 12 states "forming an object of [said] at least one property." In rejecting this element of claim 12, the Examiner again points to the data object described in the Stewart reference. At least for the same reasons described above in relation to independent claim 1, it is respectfully submitted that the data object described in the Stewart reference is in no way equivalent to a property of an object being formed as a separate object. It is respectfully submitted that independent claim 12 is also in allowable form.

Claims 13, 14, 20-23 and 25-27 are dependent upon claim 12 and are believed to be similarly distinguishable from the cited Stewart reference. Further, it is respectfully submitted, particularly when interpreted in light of the differences between claim 12 and the cited reference, that each of the rejected

dependent claims recites an element that is neither taught nor suggested by the reference cited against it.

On page 9 of the Office Action, claim 12 is rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,389,414 ("the Delo reference") in view of the Stewart reference. On page 10 of the Office Action, claims 7-10 and 15-19 are rejected under 35 U.S.C. §103(a) as being unpatentable over the Stewart reference in view of U.S. Patent No. 6,859,919 ("the Deffler reference"). All of the claims of these two rejections are dependent upon either independent claim 1 or independent claim 12.

It is respectfully submitted that the dependent claims rejected based on the two noted combinations of references are allowable for at least the same reasons discussed above in relation to their respective affiliated independent claims. Reconsideration and allowance of these dependent claims are respectfully solicited.

For all of the reasons discussed above, it is respectfully submitted that claims 1-23, and 25-27 are in condition for allowance. The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: \_\_\_\_\_



Christopher L. Holt, Reg. No. 45,844  
Suite 1400  
900 Second Avenue South  
Minneapolis, Minnesota 55402-3319  
Phone: (612) 334-3222 Fax: (612) 334-3312

CLH:rkp